REMARKS

Applicants have carefully reviewed the Office Action dated June 13, 2003. Applicants have amended Claim 22 to more clearly point out the present inventive concept. Reconsideration and favorable action is respectfully requested.

Claims 22-27 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Hudetz et al.* With respect to the amended claims, this rejection is respectfully traversed.

Applicants present inventive concept, is defined by the amended claims, is directed to a method for interconnecting two locations on a network. This is facilitated with an input device that is operable to scan a product code on a product. This input device, a scanner in the disclosure, is distributed with a unique input device ID. The purpose of this is to track the input device on the network. Once the input device is transferred to a user, this input device has unique information associated with it. Therefore, any time that particular input device is utilized, it will be registered with the central location to which the product code is transferred and routing can be facilitated through an association of routing information with the combination of the product code and the unique input device ID.

The Examiner is utilizing the *Hudetz et al.* reference and the associated input device at the first location on the network to support a rejection of Claim 22 and that the Examiner considers this input device in combination with the computer will have a unique input device ID. Although Applicants admit that every computer will have a known device ID, i.e., the ID of the network interface card, there is no association between the ID of the network card and any location on the network. It is this association in a database that allows routing of a user location to a second location on a network in association with the product code. Therefore, there must be an association between the product code, the unique device ID and the second location of the network in order to have routing to the second location in response to the step of scanning. This

is not disclosed in *Hudetz et al.* Further, the unique ID cannot in *Hudetz* follow th scanner from computer to computer. Therefore, in view of these arguments, Applicants respectfully request the withdrawal of 35 U.S.C. §102 rejection with respect to *Hudetz.*

Claims 22, 24, and 25 stand rejected under 35 U.S.C. §102(a) as being anticipated by *Byford.* This rejection is respectfully traversed with respect to amended claims.

As understood, *Byford* is a system that utilizes a scanner to scan a bar code, the scanner being a hand held scanner. The bar code information typically comprises the Air Bill number. This information is then transmitted to a delivery service web server in a conventional manner. This is then translated into a client's URL and parcel identification code for storage in a database table. There is an indication that an optional client ID can also be stored in this table. This is the table that is accessible by a client external thereto. Whenever there is a change in the database, relay software at the delivery service web site can provide updated information to a client. This is an update operation. Applicants do not believe that the scanner requires a client ID in order to locate the client. If there is an update operation, the operation would be one wherein the bar code was scanned, routed to the web server location and then a link made from the web server location to the client's location for transfer of data therebetween. There is never a situation where the location of the bar codes and scanning operation can always be connected to the client's browser location. Further, the bar code scanner does not have the ID permanently affixed thereto. As such, *Byford* fails to connect the first location to the second location, the first location being that associated with the scanner and does not have the unique ID permanently affixed to the scanner or input device. Therefore, Applicants believe that *Byford* taken alone, does not anticipate or obviate Applicants' present inventive concept as defined the amended claims. Therefore Applicants respectfully request withdrawal of 35 U.S.C. 102 rejection with respect to Claims 22, 24 and 25.

Applicants bring to the Examiner's attention two co-pending applications which have claims and subject matters similar to that of the present application and that they are directed to the input device with unique IDs that are transmitted in a message packet to an intermediate node to facilitate connecting two locations on the network. They are U. S. Patent Application Serial No. 09/379,700, filed August 24, 1999, entitled "Method for Interconnecting Two Location Over a Network and Response to using a Tool" and U. S. Patent Application Serial No. 09/496,222, filed February 1, 2000, entitled "Method for Interfacing Scanned Product Information with a Source for the Product Over a Global Network"

Applicants have now made an earnest attempt in order to place this case in condition for allowance. For the reasons stated above, Applicants respectfully request full allowance of the claims as amended. Please charge any additional fees or deficiencies in fees or credit any overpayment to Deposit Account No. 20-0780/PHLY-24,913 of HOWISON & ARNOTT, L.L.P.

Respectfully submitted,
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